

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Andrew Garrett Simmons, Debtor

**Case No. 23-50588-KMS
CHAPTER 13**

RESPONSE

COMES NOW, Debtor, by and through counsel, and responds to Trustee's Motion to Dismiss (dk # 53) as follows:

1. Debtor commenced this case on April 19, 2023 by filing a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code.
2. Debtor can continue making the plan payments.

WHEREFORE, Debtor prays for an Order denying the Motion and for such additional or alternative relief as may be just and proper.

Respectfully submitted,

By: /s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MSBN 103469)
Attorney for Debtor

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CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Response was forwarded on June 30, 2025, to:

By Electronic CM/ECF Notice:

Warren Cuntz

U.S. Trustee

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.